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AT ABINGDON, VA
FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
BIG STONE GAP

JUL 10 2018

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UNITED STATES OF AMERICA

v.

CHRISTY SANTIAGO
VICTOR LEBRON
(also known as Victor Labron)

: Case No. Q-18-CR-8

: Violations: 18 U.S.C. §§ 371, 1001, and
1791(a)(2), (b)(3) & (d)(1)(B)
21 U.S.C. §§ 841 & 846

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about May 23, 2015, at the United States Penitentiary Lee in the Western District of Virginia, CHRISTY SANTIAGO, in violation of a statute, rule, or order issued under a statute, provided to an inmate of a prison a prohibited object, buprenorphine (a/k/a Suboxone), a narcotic drug, and attempted to do so.
2. All in violation of Title 18, United States Code, Sections 1791(a)(1), 1791(b)(1) and 1791(d)(1)(C).

COUNT TWO

The Grand Jury charges that:

1. On or about May 23, 2015, at the United States Penitentiary Lee in the Western District of Virginia, CHRISTY SANTIAGO, in a matter within the jurisdiction of the executive branch of the Government of the United States:
 - a. falsified, concealed, and covered up by any trick, scheme or device a material fact, and
 - b. made a materially false, fictitious, and fraudulent statement and representation.

2. On or about May 23, 2015, SANTIAGO concealed and covered up by a trick, scheme, or device, the fact that she was introducing buprenorphine (a/k/a Suboxone), a narcotic drug, into the prison.

3. On or about May 23 2015, SANTIAGO falsely stated and represented on a Bureau of Prisons form that she did not have any narcotics or prescription drugs in her possession.

4. All in violation of Title 18, United States Code, Sections 1001(a)(1) and 1001(a)(2).

COUNT THREE

The Grand Jury charges that:

1. On or about May 23, 2015 in the Western District of Virginia and elsewhere, CHRISTY SANTIAGO knowingly and intentionally distributed and possessed with the intent to distribute buprenorphine (a/k/a Suboxone), a Schedule III controlled substance.

2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT FOUR

The Grand Jury charges that:

1. In or about April and May 2015, in the Western District of Virginia and elsewhere, CHRISTY SANTIAGO, VICTOR LEBRON, and others, knowingly conspired to commit a crime against the United States (in violation of a statute, rule, or order issued under a statute, to provide to an inmate of a prison a prohibited object, buprenorphine (a/k/a Suboxone), a narcotic drug, in violation of Title 18, United States Code, Sections 1791(a)(1), 1791(b)(1) and 1791(d)(1)(C)) and did acts to effect the object of the conspiracy, including, but not limited to, the following acts:

- a. On or about April 29, 2015, SANTIAGO sent an email with instructions on how to mail Suboxone to a USP-Lee inmate.
- b. In or about May 2015, SANTIAGO and LEBRON communicated electronically and discussed, in code, buprenorphine (a/k/a Suboxone) distribution.

- c. On or about May 23, 2015, CHRISTY SANTIAGO falsely stated and represented on a Bureau of Prisons form that she did not possess any narcotic drug or prescription drug.
 - d. On or about May 23, 2015, CHRISTY SANTIAGO introduced buprenorphine into the United States Penitentiary Lee.
2. All in violation of Title 18, United States Code, Section 371.

COUNT FIVE

The Grand Jury charges that:

1. In or about April and May 2015, in the Western District of Virginia and elsewhere, CHRISTY SANTIAGO, VICTOR LEBRON, and others, knowingly and intentionally conspired to distribute and possess with the intent to distribute buprenorphine (a/k/a Suboxone), a Schedule III controlled substance.
2. All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(E).

COUNT SIX

The Grand Jury charges that:

1. On or about May 23, 2015 in the Western District of Virginia and elsewhere, VICTOR LEBRON knowingly and intentionally possessed with the intent to distribute buprenorphine (a/k/a Suboxone), a Schedule III controlled substance.
2. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E).

COUNT SEVEN

The Grand Jury charges that:

1. On or about September 9, 2015, at the United States Penitentiary Lee in the Western District of Virginia, VICTOR LEBRON, in a matter within the jurisdiction of the executive branch

of the Government of the United States made a materially false, fictitious, and fraudulent statement and representation.

2. In or about September 2015, LEBRON falsely stated and represented that the May 23, 2015, visit by Christy Santiago was a surprise visit.
3. All in violation of Title 18, United States Code, Section 1001(a)(2).

A true bill, this 10th day of July, 2018.

/s/ Grand Jury Foreperson

Thomas T. Cullen/RR

THOMAS T. CULLEN
United States Attorney